

Ada Anglemeyer
November 5, 2020

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ADA ANGLEMEYER, et al., : CIVIL ACTION
Plaintiffs, :
: :
vs. : :
: :
NORTHAMPTON COUNTY, et :
al., :
Defendants. : No. 19-3714

- - -
Thursday, November 5, 2020
- - -

Deposition of ADA ANGLEMEYER, taken
pursuant to notice, via videoconference,
before Michele L. Murphy, a Registered
Professional Reporter and Notary Public, on
the above date, beginning at approximately
9:40 a.m.

- - -

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SUMMARY
JUDGMENT
EXHIBIT
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	Page 2	Page 4
1	APPEARANCES:	
2	LEVIN & ZEIGER	1 (It is hereby stipulated and)
3	By: BRIAN J. ZEIGER, ESQUIRE	2 agreed by and between counsel for all
4	(Via Videoconference)	3 parties present that this deposition is
5	1500 JFK Blvd., Suite 620	4 being conducted by videoconference, that
6	Philadelphia, PA 19102	5 the court reporter, all counsel, and the
7	215-546-0340	6 witness are all in separate remote
	zeiger@levinzeiger.com	7 locations and participating via
	Representing the Plaintiffs	8 videoconference meeting under the control
8	PA OFFICE OF ATTORNEY GENERAL	9 of Strehlow & Associates Court Reporting,
9	By: KEVIN BRADFORD, ESQUIRE	10 that the officer administering the oath
10	(Via Videoconference)	11 to the witness need not be in the place
11	1600 Arch Street, 3rd Floor	12 of the deposition and the witness shall
12	Philadelphia, PA 19103	13 be sworn in remotely by the court
13	215-560-2402	14 reporter after confirming the witness'
14	kbradford@attorneygeneral.gov	15 identity.)
15	Representing the Defendants	16 It is further stipulated that
16	ALSO PRESENT: Richard Anglemeyer	17 exhibits may be marked by the attorney
17	Renae Kluska	18 presenting the exhibit to the witness,
18	(Via Videoconference)	19 and that a copy of any exhibit presented
19	---	20 to a witness shall be e-mailed to or
20		21 otherwise in possession of all counsel
21		22 prior to any questioning of a witness
22		23 regarding the exhibit in question.)
23		24 (It is hereby stipulated and
24		
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2	WITNESS:	
3	Ada Anglemeyer	1 agreed by and between counsel that
4	By Mr. Bradford	2 reading, signing, sealing, filing and
5		3 certification are waived; and that all
6		4 objections, except as to the form of
7		5 questions, be reserved until the time of
	EXHIBITS	6 trial.)
8	No. Description Ref.	7
9	D-1 Copy of photograph of	8
10	property 29	9
11	D-2 Copy of photograph of French	10
12	doors 38	11
13	D-3 Copy of photograph of gun 38	12
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<p style="text-align: right;">Page 6</p> <p>1 to provide the best answer possible, to your 2 recollection.</p> <p>3 As we just discussed briefly off the 4 record, if you need a break for any reason and 5 you might need a break depending on how your 6 physical condition is today, we can take as 7 many breaks as you need. Just let me know. 8 And, yes, if a question is pending, please go 9 ahead and answer that question first before we 10 ask for that break. Okay?</p> <p>11 A. Okay.</p> <p>12 Q. You're at your house right now?</p> <p>13 A. Yes.</p> <p>14 Q. And is someone in the room with you 15 there?</p> <p>16 A. Yes.</p> <p>17 Q. And who is in the room with you?</p> <p>18 A. My husband.</p> <p>19 Q. Okay.</p> <p>20 A. And my daughter.</p> <p>21 Q. Okay. Can you name each of those 22 individuals?</p> <p>23 A. Richard Anglemeyer and Renae Kluska.</p> <p>24 Q. Is anyone else there with you?</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. How long have you been married to 2 him?</p> <p>3 A. In March it will be 60 years.</p> <p>4 Q. Wow. Congratulations. A long time. 5 And you have children. Tell me 6 about the names and just the month and years 7 of birth for each of your children.</p> <p>8 A. Oh, boy. Vernon Anglemeyer was born 9 in October 18th of '61.</p> <p>10 Q. What was his name?</p> <p>11 A. Vernon Anglemeyer.</p> <p>12 Q. Okay. Got you.</p> <p>13 A. Jeffrey Anglemeyer, December the 24th.</p> <p>14 THE WITNESS: What year was it? 15 Ask Jeff what year he was born.</p> <p>16 MRS. KLUSKA: Jeff, what year 17 were you born?</p> <p>18 THE WITNESS: '62. Okay. I 19 thought it was, but I wasn't sure.</p> <p>20 BY MR. BRADFORD:</p> <p>21 Q. Okay. Keep going.</p> <p>22 A. Mark Anglemeyer, September the 12th. 23 Just a minute. I got to think.</p>
<p style="text-align: right;">Page 7</p> <p>1 A. No.</p> <p>2 Q. What is your month and year of 3 birth, not the day?</p> <p>4 A. March '41.</p> <p>5 Q. One other thing I wanted to say at 6 the beginning is that my intention is not to 7 upset you or annoy you or aggravate you or 8 anything like that, but as part of my job as 9 representing the troopers as part of this 10 lawsuit, I have to ask these questions. So 11 don't be offended by anything that I ask you. 12 Okay? I'm just doing my job, and Brian will 13 interject if I'm doing something 14 inappropriate, which I'm sure won't happen, 15 but he's in the room here too.</p> <p>16 So what is your height and weight?</p> <p>17 A. 5'2", about 160.</p> <p>18 Q. And was your weight any different in 19 February of 2018?</p> <p>20 A. About the same.</p> <p>21 Q. About the same, okay.</p> <p>22 And you said you are married to 23 Richard Anglemeyer?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 9</p> <p>1 MRS. KLUSKA: Mark, what year 2 were you born?</p> <p>3 THE WITNESS: '65. Yeah, '65.</p> <p>4 BY MR. BRADFORD:</p> <p>5 Q. Okay.</p> <p>6 A. Renae Kluska.</p> <p>7 MRS. KLUSKA: January 2nd, '73.</p> <p>8 THE WITNESS: January 2nd.</p> <p>9 What year, Renae?</p> <p>10 MRS. KLUSKA: '73.</p> <p>11 THE WITNESS: '73.</p> <p>12 BY MR. BRADFORD:</p> <p>13 Q. Okay. And who lives with you of 14 those people of your children?</p> <p>15 A. As of now, it's Jeffrey Anglemeyer, 16 Mark Anglemeyer, Richard Anglemeyer, myself, 17 and Clyde Buskirk, and Tyeler Trinkley, my 18 grandson.</p> <p>19 Q. I was asking just of your children, 20 but those are all the people that live with 21 you right now; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. And I'm sorry. You said Mark, 24 Renae, Jeffrey. Does Jeffrey live with you?</p>

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1 A. Yes. 2 Q. Okay. Vernon does not live with 3 you? 4 A. No. 5 MRS. KLUSKA: Not anymore. 6 BY MR. BRADFORD: 7 Q. Where does he live? 8 A. About a mile up the road. 9 Q. Do you see him regularly? 10 A. Off and on. Pretty much. 11 Q. And then you mentioned someone named 12 Clyde. Who is that? 13 A. Yes. It's like a foster son. He 14 lives with us. 15 Q. What's Clyde's last name? 16 A. Buskirk. 17 Q. What was that? I'm sorry. 18 A. Buskirk, B-U-S-K-I-R-K. 19 Q. And how old is Clyde? 20 A. He's -- what are you, 59? 21 MRS. KLUSKA: I will ask him. 22 Clyde? 23 BY MR. BRADFORD: 24 Q. That's fine. I don't need --	1 have Tyeler, I have Richard Anglemeyer, I 2 have Monica, and I have some 3 step-grandchildren, which would be two 4 more. 5 BY MR. BRADFORD: 6 Q. Who are the step-grandchildren? 7 A. One would be Ryan. I don't know 8 their last names. And Jessica. Oh, it would 9 be three of them. Jessica was a 10 step-grandchild. 11 And what's Jim's, the oldest? 12 MRS. KLUSKA: Oh, my God. 13 Rachel. 14 THE WITNESS: Rachel. 15 BY MR. BRADFORD: 16 Q. Okay. And I'm asking for dates of 17 birth just so I have an idea of how old they 18 are, but how old is Richard? You can just 19 give me the year of birth. I don't need exact 20 dates. 21 A. The year -- what is he? 25? 22 MRS. KLUSKA: No. Maybe, 23 because Tyeler is -- 24 THE WITNESS: He's about 25.
Page 11	Page 13
1 A. I think he's 59. 2 Q. Okay. And you said Tyeler Trinkley? 3 A. Mm-hmm. 4 Q. That's your grandson? 5 A. Yes. 6 MRS. KLUSKA: Clyde is 59, mom. 7 BY MR. BRADFORD: 8 Q. And what's his date of birth? 9 A. Tyeler's birth is -- 10 MRS. KLUSKA: July 18th, 1997. 11 THE WITNESS: -- July 18th, 12 '87. 13 MRS. KLUSKA: No; '97. 14 THE WITNESS: '97. Sorry. 15 BY MR. BRADFORD: 16 Q. All right. And Tyeler is Renae's 17 son? 18 A. Yes. 19 Q. How many other grandchildren do you 20 have besides Tyeler? 21 A. Well, I got -- 22 MRS. KLUSKA: It was Kierra 23 first. 24 THE WITNESS: I have Kierra, I	1 I'm not going to say exactly, but he's 2 about 25. 3 BY MR. BRADFORD: 4 Q. Okay. And Kierra? 5 MRS. KLUSKA: 19. 6 THE WITNESS: 18. 7 MRS. KLUSKA: 19. 8 THE WITNESS: 19. Boy, she's 9 getting old. 10 BY MR. BRADFORD: 11 Q. Monica? 12 MRS. KLUSKA: Jeff, how old is 13 Monica? 14 THE WITNESS: 35. 15 BY MR. BRADFORD: 16 Q. What's Monica's last name? 17 A. Travostino. Don't ask me to spell 18 it. 19 Q. Okay. That's fine. 20 Okay. What is your address? 21 A. 340 Old Allentown Road, Wind Gap, 22 Pennsylvania 18091. 23 Q. And how long have you lived there? 24 You can tell by years or the date -- I mean

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<p>1 the year that you got there. 2 THE WITNESS: How old are you? 3 MRS. KLUSKA: 47. 4 THE WITNESS: About 46 years. 5 MRS. KLUSKA: 45, 46. 6 BY MR. BRADFORD: 7 Q. And an estimate on something like 8 that -- if you're estimating, just let me 9 know. That's fine. And if I'm looking for 10 something more specific, I'll pry a little 11 more. 12 A. Okay. 13 Q. So about 47 years, somewhere around 14 there? 15 A. Yeah, something like that. 16 Q. And do you currently work? 17 A. No. 18 Q. When was the last time that you 19 worked? 20 A. I used to run my business at the 21 Quarry before I had my surgery. 22 Q. And was that the Quarry Beach 23 Hideaway? 24 A. Yes.</p>	<p>1 Okay? 2 So you said you worked at the Quarry 3 Beach Hideaway before. What is that? Can you 4 describe that? 5 A. It's like a picnic grove. 6 Q. And where is that? 7 A. By my house. 8 Q. Is it on your property? 9 A. Yes. 10 Q. And how did you use that to generate 11 income? 12 A. I rented it out for parties. 13 Q. And how much income does that 14 generate or did that generate when you were 15 working there? 16 A. It's only a part-time summer thing. 17 Maybe 4,000, 5,000, something in there. 18 Q. And what did you personally do as 19 operating that? 20 A. Cleaned, mowed grass, the upkeep of 21 it. 22 Q. Who else -- first of all, when did 23 you stop involving yourself in that operation? 24 A. After my surgery.</p>
<p>1 Q. And I got that from -- do you 2 remember doing some written responses to 3 questions I sent to you from Brian? 4 A. Mm-hmm. 5 COURT REPORTER: Is that a yes? 6 I'm sorry. 7 THE WITNESS: I'm sorry? 8 COURT REPORTER: Is that a yes? 9 THE WITNESS: Yes. Yes. I'm 10 sorry. 11 BY MR. BRADFORD: 12 Q. That's one of my instructions I 13 should have given you. 14 A. Yes. I'm sorry. 15 Q. First of all, don't talk over -- we 16 can't have everyone in the room talking at the 17 same time, but especially if you're answering 18 a question, try to make sure it's a yes or no 19 or something like that instead of mm-hmm, 20 uhn-uhn, because that's a problem for the 21 court reporter. And also even if you know 22 where I'm going with the question, let me get 23 the whole question out so she can get the 24 question in and then get your full answer.</p>	<p>1 Q. When was your surgery? 2 A. October 18th, 2017. 3 Q. Okay. And do other members of your 4 family operate the Quarry Beach Hideaway or 5 other people operate it? 6 A. My daughter and -- well, Renae and 7 Mark would help me. 8 Q. Okay. 9 A. I also hired people to mow the 10 grass. 11 Q. Okay. And that's now? 12 A. Mm-hmm. Yes. 13 Q. And before then, you would mow the 14 grass yourself? 15 A. Yes. 16 Q. Okay. And before October 2017, were 17 Renae and Mark also working with the Quarry 18 Beach Hideaway operation? 19 A. Yes. 20 Q. Did anyone else, either before or 21 after October 2017, work on the Quarry Beach 22 Hideaway? 23 A. Yes. 24 Q. Who is that?</p>

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<p style="text-align: right;">Page 18</p> <p>1 A. A neighbor, Carl Raub, used to help 2 out and Steve used to help mow grass. That's 3 about it. 4 Q. Is income generated from the Quarry 5 Beach Hideaway, is that reflected in any tax 6 documents or any other documents that would 7 show -- 8 A. Yes. I filed it for rental income, 9 yes. 10 Q. Okay. So you have documents that 11 would indicate exactly what you made per year 12 on the -- 13 A. On my taxes, yes. 14 Q. It would be on your taxes? Okay. 15 Is it specified on there? I'd be 16 able to figure out what was for Quarry Beach 17 Hideaway and -- well, I guess that would be 18 all your income? 19 A. Yes. 20 Q. Okay. Before that, what else did 21 you do for a living? 22 A. Just my pension. 23 Q. And what's the pension from? 24 A. Railroad and --</p>	<p style="text-align: right;">Page 20</p> <p>1 actually do as far as managing those? 2 A. I did almost everything. I painted, 3 cleaned, fixed different things. I used to do 4 it all almost. 5 Q. And when did you stop? 6 A. We sold the apartments and I haven't 7 done anything in the last almost three years now. 8 Q. Since the surgery? 9 A. Mm-hmm. 10 Q. That's a yes? 11 A. Yes. Sorry. 12 Q. It's human nature. 13 Okay. The bar that you owned, where 14 was the bar and what was the name of it? 15 A. Sportsman's Bar, and it was in 16 Bangor, Pennsylvania. 17 Q. And about what years did you own 18 that? 19 A. I had it for about 11 years. 20 Q. Can you approximate what 11 years 21 that was? 22 A. I wouldn't know the exact date. I 23 know it's about 15 years ago.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. I'm sorry. You broke up there. 2 What was that? 3 A. From the railroad pension. My 4 husband worked on the railroad. 5 Q. Okay. What railroad was that? 6 A. There was different ones. Conrail, 7 Norfolk Southern. 8 Q. So freight railroads? 9 And I saw in your Interrogatory 10 responses that you owned rental apartments? 11 A. Yes. 12 Q. That generates some income? 13 A. Oh, yes. Yes. 14 Q. First of all, do you currently own 15 any? 16 A. We have a couple of houses and a 17 trailer that's rented out. 18 Q. And did you have others in the past, 19 like more properties? 20 A. I had a bar quite a few years ago. I think it's almost 20 years now. 21 Q. Okay. We'll get to that in a 22 minute. 23 The apartments, what did you</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. And what did you do there? 2 A. Bartend and manage it. 3 Q. And who formally owned it? Yourself 4 and your husband or anyone else? 5 A. It was in my name. 6 Q. In your name. 7 Did any other family members work 8 there? 9 A. Yes. 10 Q. Who worked there? 11 A. Vernon, my son; my daughter; and 12 Mark Anglemeyer and Mary Ann Anglemeyer. 13 Let's see. Lisa Lotterman. 14 Q. Who is Lisa Lotterman? 15 A. Yes. 16 Q. Who was that? 17 A. Lisa Lotterman and also a Lisa Raub 18 helped out. 19 Q. Are these family members or just other people that worked there? 20 A. That was other people. 21 Q. Got you. I was just wondering. 22 Okay. I thought I had asked just family 23 members, but that's fine.</p>

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<p style="text-align: right;">Page 22</p> <p>1 So family-wise it was Vernon, Renae, 2 and Mark? 3 A. Right. Yes. 4 Q. Did your husband work there at all? 5 A. No. 6 Q. And you no longer own that bar? 7 A. No. 8 Q. I guess did you sell it, or what 9 happened with it? 10 A. Sold it. 11 Q. Why did you sell it? 12 A. I sold the liquor license. I didn't 13 sell the building. 14 Q. Okay. 15 A. Turned the building into apartments. 16 Q. And you don't own those apartments 17 today? 18 A. No. 19 Q. Were those the apartments you were 20 talking about earlier that you managed and 21 rented? 22 A. Yes. 23 Q. Why did you sell the liquor license 24 and shut down the bar?</p>	<p style="text-align: right;">Page 24</p> <p>1 for drugs or -- 2 A. Yes. Somebody got arrested. 3 Q. Okay. Do you know how many times 4 someone got arrested or charged with anything 5 related to drugs at the bar? 6 A. Just that one time. 7 Q. Just one time? 8 Were you made aware of drug activity 9 through anyone other than the police? 10 A. No. 11 Q. So when you say that you got out of 12 that business because of the drugs, it was 13 just based on that one incident? 14 A. Yes. I didn't want to be bothered 15 with it no more. 16 Q. Did your son Mark get arrested for 17 selling cocaine at the bar in 1999? 18 A. Yes. 19 Q. Is that the incident you're talking 20 about or is that a separate incident? 21 A. That was the incident. 22 Q. And it's my understanding that a 23 number of people got arrested at that time? 24 A. Lisa Lotterman got arrested. The</p>
<p style="text-align: right;">Page 23</p> <p>1 A. There was some trouble. 2 Q. What kind of trouble? And, again, 3 I'm not trying to upset you, but -- 4 A. You can't control people, and I 5 couldn't run it by myself. 6 Q. Okay. So people were -- what were 7 people doing that you couldn't control? 8 A. Drugs. 9 Q. When you say "drugs," what do you 10 mean? People using drugs? People selling 11 drugs? 12 A. I don't know. I didn't see any of 13 it. 14 Q. How did you know that there were 15 drug issues there? 16 A. Well, that's what the police said 17 and it... 18 Q. Okay. And on what occasions did the 19 police tell you about drug activity? 20 A. Man, that's years ago. 21 Q. What would be the context of -- 22 that's kind of a broad question. Let me try 23 to narrow the context a little bit. 24 Were people getting arrested there</p>	<p style="text-align: right;">Page 25</p> <p>1 Mayor, the Mayor of Bangor. 2 Q. And before Mark got arrested, had 3 you suspected that he was doing drugs there? 4 A. No. I even put cameras in the bar, 5 five different cameras, to watch it at home. 6 I couldn't control it, and when this happened, 7 I decided that was it. 8 Q. Okay. Do you know the outcome of 9 the charges against Mark? 10 A. Not exactly. 11 Q. Was he convicted of anything? 12 A. I couldn't tell you for sure. I 13 don't know. 14 Q. All right. I want to talk about 15 Jeffrey Anglemeyer. Was he arrested in 2001 16 for selling meth? 17 A. That I wouldn't be able to say 18 either, because I don't know. 19 Q. You're not aware of that? 20 A. I heard of it. I don't know dates 21 or anything like that. 22 Q. In 2001, was he living with you? 23 A. No. 24 Q. When did he start -- obviously he</p>

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<p style="text-align: right;">Page 26</p> <p>1 lived with you when he was a kid. He lives 2 with you now. How long has he lived with you 3 right now?</p> <p>4 A. Right now I think -- well, since he 5 got a divorce. He's here about two years.</p> <p>6 Q. Okay. You've never been arrested?</p> <p>7 A. No.</p> <p>8 Q. Did any of these incidents that we 9 just talked about with your sons give you any 10 negative feelings towards law enforcement or 11 government or anything like that?</p> <p>12 A. No.</p> <p>13 Q. Okay. Before February 2018, did the 14 police ever come to your house?</p> <p>15 A. Yeah. Yes.</p> <p>16 Q. Can you tell me how many times?</p> <p>17 A. It was for different things. I 18 wouldn't be able to say for sure. I don't 19 know.</p> <p>20 Q. Okay. For what types of things did 21 they come? I understand that you don't know 22 the exact dates or anything like that.</p> <p>23 A. Well, there was a young couple that 24 got in a fight at a party when it was rented</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Like what?</p> <p>2 A. I said I like to target practice.</p> <p>3 Q. Okay. When was the last time you 4 target practiced?</p> <p>5 A. Actually not that long ago. Maybe a 6 month ago.</p> <p>7 Q. And you do that on your property 8 there?</p> <p>9 A. Yes.</p> <p>10 Q. Would it be unusual for you to be 11 carrying around a pistol while on your 12 property?</p> <p>13 A. I have a permit.</p> <p>14 Q. Okay. So your answer is, no, it's 15 not unusual for you to be walking around with 16 a pistol on you?</p> <p>17 A. No, it's not unusual.</p> <p>18 Q. Okay. Does anyone else target 19 practice on the property, whether they live 20 there or not?</p> <p>21 A. My daughter, my grandsons.</p> <p>22 Q. Renae and --</p> <p>23 A. Tyeler, Ricky, and Kierra.</p> <p>24 Q. Have you ever had any complaints or</p>
<p style="text-align: right;">Page 27</p> <p>1 out and they came. And then they stopped in 2 and asked if they could check out one of our 3 rentals. We gave them a written permission to 4 do so.</p> <p>5 I can't think of everything. I 6 don't know. That's about all I can think of 7 right now.</p> <p>8 Q. Okay. And during those encounters, 9 did anyone, whether you or anyone else that 10 was living at the house with you, express any 11 hostility towards the police?</p> <p>12 A. No.</p> <p>13 Q. Those interactions were cordial 14 always?</p> <p>15 A. Yes; friendly.</p> <p>16 Q. Do you own any firearms?</p> <p>17 A. Yes.</p> <p>18 Q. How many do you own?</p> <p>19 A. Myself personally? Probably three 20 or four.</p> <p>21 Q. And what types of firearms are they, 22 like rifles or handguns?</p> <p>23 A. Mine are pistols. I like to target 24 practice.</p>	<p style="text-align: right;">Page 29</p> <p>1 anything like that from the neighbors about 2 target practicing?</p> <p>3 A. No.</p> <p>4 Q. Gunshots, anything like that?</p> <p>5 A. No.</p> <p>6 Q. I want to talk a little bit more 7 about your property, and as we go through this 8 deposition, I'm going to show you some 9 documents by sharing the screen.</p> <p>10 A. Okay.</p> <p>11 Q. I'm going to do that now, and if 12 you're having trouble seeing anything or you 13 need to move around, just let me know. Okay?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Can you see it looks like a 16 satellite image? Can you see that okay?</p> <p>17 A. Yes.</p> <p>18 MR. BRADFORD: And for the 19 record, we'll mark this as D-1. It's 20 Bates stamped PSP-338, Brian.</p> <p>21 BY MR. BRADFORD:</p> <p>22 Q. And just to assist us here -- I'm 23 just doing this for the record, 24 Mrs. Anglemeyer -- I put a green circle on</p>

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<p>1 here and a red circle and then I wrote four 2 numbers, 1, 2, 3, and 4, within the green 3 circle.</p> <p>4 So does this appear to be a 5 photograph of at least part of your property?</p> <p>6 A. My home.</p> <p>7 Q. Okay. And your home, is it fair to 8 say that's in the green circle?</p> <p>9 A. Yes.</p> <p>10 Q. And the red circle, is that the 11 garage?</p> <p>12 A. It's a different building on the 13 property. It's a different address.</p> <p>14 Q. Okay. Well, is that the garage that 15 the State Police searched?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. I'm going to call that the 18 garage. So what are you saying, that it's --</p> <p>19 A. It's like a workshop, yes.</p> <p>20 Q. Okay. But for purposes of the 21 deposition, I'm going to call it the garage. 22 Okay?</p> <p>23 A. Okay.</p> <p>24 Q. Just to be consistent here.</p>	<p>1 also have two of them downstairs.</p> <p>2 Q. Okay. So there's two downstairs, 3 two in the lower level?</p> <p>4 A. Wait a minute. We actually have 5 five bedrooms.</p> <p>6 Q. Okay. And, again, just so we keep 7 this clear, I'm going to use upper and lower 8 level, because I understand it's kind of like 9 a split level?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So you had two bedrooms on 12 the lower level?</p> <p>13 A. Yes.</p> <p>14 Q. And then three on the upper level?</p> <p>15 A. Is there three -- three. No. 16 There's four upstairs.</p> <p>17 MRS. KLUSKA: Three. No; 18 you're right.</p> <p>19 THE WITNESS: There's four. 20 There's four. Yeah, there's four 21 upstairs. That's four. That's six 22 bedrooms.</p> <p>23 BY MR. BRADFORD:</p> <p>24 Q. So it's six bedrooms, four upper</p>
<p>1 And my understanding is there was a 2 trailer on the property that was searched as 3 well. I've got my cursor over this kind of 4 long skinny thing to the left of the red 5 circle. Is that the trailer?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. I'm just trying to get my 8 bearings here.</p> <p>9 And I want to talk about your 10 residence first. How many bedrooms is the -- 11 I'll call that the house.</p> <p>12 A. Four.</p> <p>13 Q. Four bedrooms?</p> <p>14 A. Mm-hmm. Yes.</p> <p>15 Q. About how many square feet is the 16 house?</p> <p>17 A. I don't know.</p> <p>18 Q. Okay. And it's my understanding 19 it's two stories?</p> <p>20 A. Yes.</p> <p>21 Q. Are all the bedrooms on one of those 22 stories or are they spread out? Where are the 23 bedrooms located at?</p> <p>24 A. They're on the second story and I</p>	<p>1 level, two lower level?</p> <p>2 A. Right.</p> <p>3 Q. Okay. And where my little No. 1 is, 4 is that the front entrance to the house? Is 5 that the front door?</p> <p>6 A. Yes.</p> <p>7 Q. And then the 4 over in that area 8 is -- and I can show you another picture. Is 9 that like a slider to the lower level?</p> <p>10 A. It's like -- it's a French door, 11 yes.</p> <p>12 Q. French door, okay. 13 And I'll share another picture with 14 you.</p> <p>15 Okay. Is that the French door that 16 you were just talking about?</p> <p>17 A. Yes.</p> <p>18 Q. Let me go back to the first picture. 19 And the front door leads to the 20 upper level, and the French door on the side 21 by the No. 4, that leads to the lower level; 22 is that right?</p> <p>23 A. Right.</p> <p>24 Q. Okay. Are there surveillance</p>

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<p style="text-align: right;">Page 34</p> <p>1 cameras on the property at all? 2 A. Yes. 3 Q. Where are they located? 4 A. There was one on what you call over 5 there the garage. We have another garage and 6 we have it as a game room actually right now. 7 So it would be there. 8 Q. Is it in the green circle? 9 A. Yes, but it's not within any of the 10 numbers. It's between the 4 and the 3. 11 Q. Okay. Kind of where the red dot is? 12 A. Yeah; below that. Okay. 13 Q. So you have a surveillance camera on 14 the outside of the property there? What does 15 it capture? 16 A. I actually didn't have them on, but 17 there was also surveillance cameras over in 18 what you call the garage. 19 Q. Okay. And when you say there's 20 another garage, that's what you're talking 21 about the game room? 22 A. Yes. 23 Q. Okay. So the other garage that 24 you're referencing is within the green circle?</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Like was it theft of people that 2 were coming to use the Quarry Beach Hideaway 3 or just stuff in the middle of the night? 4 What type of theft are you talking about? 5 A. Well, we had -- that's other times 6 that we had the police here, but different 7 things that got stolen. 8 Q. Okay. And on those occasions, you 9 would call the police there? 10 A. Yes. 11 Q. And, again, this theft, was it part 12 of your business or was it just stuff that 13 was -- what type of -- can you give me some 14 example of that? 15 A. One time my husband had a junkyard 16 and things got stolen, and there was different 17 times that the police were here about things 18 like that. 19 Q. Do you know why Mark installed 20 cameras over by the garage in the red circle 21 area? 22 A. Because he has a lot of tools there. 23 He's the one that does all my upkeep for my 24 Quarry, for my house, for everything. He has</p>
<p style="text-align: right;">Page 35</p> <p>1 A. Yes. 2 Q. Okay. So you have one over there 3 and then you said there's -- how many are over 4 by the garage in the red circle? 5 A. I'm not sure. 6 Q. Who installed those cameras? 7 A. I had it installed in my house. I 8 don't know the company. And in the garage I 9 think my son installed it himself. 10 Q. Were they installed before February 11 2018 when the State Police came? 12 A. Yes. 13 Q. And do you have any driveway sensors 14 or anything like that -- 15 A. No. 16 Q. -- that would notify you if someone 17 drove onto the property? 18 A. No. 19 Q. Why did you install the surveillance 20 camera, at least the one that you were 21 responsible for installing in the green 22 circle? 23 A. Because of theft. We were having 24 trouble with theft.</p>	<p style="text-align: right;">Page 37</p> <p>1 a lot of tools. 2 Q. Okay. Would you go to the -- again, 3 when I say "garage," I'm talking about the one 4 in the red circle. Do you regularly go into 5 that garage? 6 A. I wouldn't say regularly, but I do 7 go there. 8 Q. And would you ever look around and 9 see what's in there? 10 A. Yeah, because he fixes my stuff. 11 Q. Okay. And that's the same now as -- 12 I didn't say when, but also in February 2018, 13 you would go in there sometimes? 14 A. Yes. 15 Q. Who else would go in there that you 16 know of? 17 A. My daughter, my sons. He has 18 friends that sometimes stop there and he also 19 had a guy that was coming there to fix his 20 car, worked on his car and used the garage. 21 Q. Who was that? 22 A. Some Werner. I forget his first 23 name. 24 Q. What was the last name? I'm sorry.</p>

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<p style="text-align: right;">Page 38</p> <p>1 A. Werner. 2 Q. Do you know if he kept any firearms 3 in there? 4 A. No, I don't know. 5 Q. Did you ever suspect that he was 6 dealing drugs in that garage? 7 A. No. 8 Q. I'm going to show you a couple more 9 pictures. I don't know if I marked this for 10 the record, but before I do this, D-2 is the 11 second picture that I showed you of the French 12 doors. 13 A. Yes. 14 Q. I'm going to show you what will be 15 D-3, and let me explain to you what this is. 16 This is one of the photographs that was taken 17 by the local police after the State Police 18 showed up and they conducted a search on 19 February 23rd, 2018. So what I'm showing you 20 is a picture of a gun that was in that garage. 21 Had you seen that -- 22 A. No. 23 Q. -- gun before? 24 A. No.</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. I'm going to show you a few other 2 pictures. Again, this is D-4. This is 3 another photograph taken from the garage on 4 February 23rd, 2018. It appears to be a 5 digital scale. Had you ever seen that in the 6 garage before? 7 A. No. 8 Q. Okay. Let me show you D-5. It's 9 again a photograph taken by local police on 10 February 23rd, 2018, a box of empty vials. 11 Had you ever seen that before February 23rd, 12 2018? 13 A. No. 14 Q. Are you aware that certain drugs are 15 distributed in containers like this? 16 A. No. 17 Q. Okay. 18 A. I know he makes rockets. 19 Q. Okay. And the last picture is D-6, 20 which is a photograph from the garage on 21 February 23rd, 2018. It's packets of small 22 Ziplock bags. Had you seen that before 23 February 23rd, 2018? 24 A. No.</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. You've never seen that gun before? 2 A. No. 3 Q. So you never saw it in the garage or 4 anywhere else? 5 A. No. 6 Q. Do you know whose gun that is? 7 A. Pardon me? 8 Q. Do you know who owns that gun or who 9 purchased it? 10 A. No. I heard that somebody owned it, 11 but I don't know. I never knew it at the 12 time. 13 Q. Okay. So at the time, you weren't 14 aware of this gun at all? 15 A. No. 16 Q. And what did you hear afterwards 17 about the gun? 18 A. That Karen Rice, it was Karen Rice's 19 gun, and she left it there. 20 Q. And you see I guess it has some sort 21 of silencer on the end of it? 22 A. I wouldn't know. 23 Q. You don't know what that is? 24 A. No. Like I said, I never seen it.</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. Do you understand that this 2 packaging is used to distribute drugs? 3 A. No. 4 Q. Do you know what he would be using 5 that for? 6 A. No. 7 Q. Okay. The trailer, what was kept in 8 there? 9 A. Isn't that the house trailer? 10 Q. The trailer -- I'll pull the screen 11 up again. Did the State Police search a 12 trailer on your property on February 23rd? 13 A. Yes, but it wasn't his trailer. 14 It's somebody else's that had parked it there. 15 Q. Okay. So when did that trailer get 16 there? 17 A. I don't know. It's been there for a 18 while. I couldn't give you a date. 19 Q. Do you know what was in the trailer 20 before February 23rd, 2018? 21 A. No, because it's not our trailer. 22 Q. Did you ever go in the trailer? 23 A. No. 24 Q. Whose trailer was it?</p>

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<p style="text-align: right;">Page 42</p> <p>1 A. Matt. What's his last name? I 2 don't even know. It's Matt. I don't know his 3 last name. 4 Q. And I understand you never went in 5 there. Were you aware of anyone else who 6 lived at the property going in that trailer? 7 A. No. 8 Q. How many acres is the property you 9 have there? 10 A. Well, we have different addresses. Together I'd say maybe 50-some acres. 12 Q. I just want to pull up this picture 13 again. So this is like -- down here in the 14 bottom left is -- for the record, I'm showing 15 you D-1. The bottom left is like a pond or a 16 lake or something? 17 A. It's the Quarry. 18 Q. That's the Quarry? 19 A. Mm-hmm. 20 Q. That's water, right? 21 A. Yes. 22 Q. What's this tan area right here? 23 A. That's my rental. That's my picnic 24 grove. That's the sandy beach.</p>	<p style="text-align: right;">Page 44</p> <p>1 road, is that part of your property? 2 A. On the other side of the road? 3 Q. You see this road coming through here? 4 A. Yes, I see that. Geez, I don't know. I can't place it. 5 Q. It looks like if you pulled out of 8 your main driveway there and made a left, this 9 would come by on your right-hand side. 10 A. Yes. That is. 11 Q. So that is part of your property? 12 A. Wait a minute. No. No. This is -- 13 over here is our property. This is -- what is 14 this, Richard? We don't own anything on the 15 other side of the road. Isn't that -- 16 MR. ANGLEMEYER: That's 17 Amerman. 18 THE WITNESS: No. That's not 19 ours. That's Amerman's. BY MR. BRADFORD: 21 Q. Just because I'm asking you 22 something doesn't mean I'm suggesting that I 23 think it is your property or anything like 24 that.</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. Okay. And these two smaller 2 structures -- I guess there's actually three. 3 What are these other structures here around 4 here? 5 A. Well, there's two pavilions. One is 6 a trailer that I used to cater. I don't no 7 more. And my equipment is in there, in the 8 trailer. 9 Q. Is that the bigger -- 10 A. The pavilion, a big pavilion. 11 Q. So the pavilion is open air, right? 12 It's just got a roof? 13 A. Yes. 14 Q. The trailer is closed in? 15 A. Yes. 16 Q. Okay. And is there another 17 structure there or is that -- 18 A. Yeah. That's another pavilion. 19 Q. That's another smaller pavilion? 20 A. Mm-hmm. 21 Q. Is this sand right here? 22 A. Yes. 23 Q. And these structures on the bottom 24 left that seem to be on the other side of the</p>	<p style="text-align: right;">Page 45</p> <p>1 A. Yeah. 2 Q. I'm just asking questions. Okay. 3 In February 2018, did you have -- I 4 think I asked you how many firearms you have 5 now. Did you have three or four pistols back 6 then? 7 A. Yes. 8 Q. Where did you keep those? 9 A. My bedroom. 10 Q. Were they locked in a safe or 11 anything or were they normally just out 12 somewhere? Or where in the bedroom, I guess 13 is the question? 14 A. I have like a cabinet above my bed. 15 I always keep them there. 16 Q. Okay. Is it locked? 17 A. No. 18 Q. Were there any other firearms in the 19 house? 20 A. Yes; in the safe. 21 Q. First of all, how many? 22 A. I don't really know. It's -- I 23 don't know. In the... 24 COURT REPORTER: Sorry. I just</p>

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<p style="text-align: right;">Page 46</p> <p>1 missed that. You froze for a second. 2 BY MR. BRADFORD; 3 Q. Yes. Just repeat that answer, 4 please. 5 A. I said it was in the safe, like 6 hunting rifles. 7 MR. ZEIGER: And I'm going to 8 make an objection on the record. After 9 the state troopers left, apparently the 10 local police stole the guns. I'm going 11 to make an objection. 12 MR. BRADFORD: Sounds like 13 you're making a speech, but -- 14 MR. ZEIGER: Well, I'm going to 15 do it. They stole the guns from them. 16 MR. BRADFORD: Okay. 17 MR. ZEIGER: And they have 18 them, and they refuse to give them back 19 to the Anglemeyers. So these questions 20 maybe are better geared towards them, and 21 if you want to depose any of those local 22 police, I'm totally in favor of it. 23 MR. BRADFORD: I'm asking 24 before February 23rd, 2018, Brian.</p>	<p style="text-align: right;">Page 48</p> <p>1 so. I'm not exactly sure. 2 Q. Okay. Where was the safe? 3 A. In our rec room. 4 Q. Was it normally locked? 5 A. The safe was, yes. 6 Q. Was it a key or a combination? 7 A. It's both. 8 Q. Okay. And did you have access to 9 that safe? 10 A. Yes. 11 Q. Who else was able to open that safe? 12 A. My husband. 13 Q. And who else beside you and your 14 husband? 15 A. No one. 16 Q. What's that? 17 A. No one. 18 Q. Okay. And it's your testimony that 19 in February 2018 the only guns that were in 20 the house were the three or four pistols you 21 had that you kept in your bedroom and you 22 don't know the number but a number of rifles 23 that were kept locked in a safe? 24 A. No. There's others.</p>
<p style="text-align: right;">Page 47</p> <p>1 MR. ZEIGER: I understand. 2 MR. BRADFORD: If you want to 3 ask about afterwards, you can -- 4 MR. ZEIGER: They were there. 5 The local police still have them and 6 refuse to give them back. So I would 7 just object to these questions, but I'm 8 going to instruct her to answer. 9 MR. BRADFORD: Okay. Thank 10 you. 11 BY MR. BRADFORD: 12 Q. And, Ms. Anglemeyer, that's another 13 thing that happens during depositions. 14 Sometimes there will be an objection, and 15 unless your counsel tells you not to answer, 16 he's just doing it for the record. Okay? 17 A. Okay. 18 Q. All right. So getting back to where 19 I was. You said that other than the three or 20 four pistols you owned, there were hunting 21 rifles in the house somewhere? 22 A. Yes; in the safe. 23 Q. They were all in the safe? 24 A. Well, the hunting rifles, I think</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. Tell me about the others, other than 2 the ones you just talked about. 3 A. Well, I know that my husband had his 4 I think in the kitchen. 5 Q. What kind of weapon is that? 6 A. A nine millimeter. 7 Q. Okay. And where in the kitchen was 8 it normally kept? 9 A. In a China closet drawer. 10 Q. And that drawer wasn't locked or 11 anything? 12 A. No. 13 Q. So we have that. What other guns? 14 A. Upstairs my daughter had one. I 15 think my grandson -- I don't know. 16 Q. The one your daughter, Renae -- is 17 Renae -- 18 A. Yes. Renae had some, yes. 19 Q. How many guns did she have in 20 February 2018? 21 A. I don't know. 22 Q. Was it more than one? 23 A. Yes. 24 Q. And where would she normally keep</p>

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<p>1 them?</p> <p>2 A. I think she had one at her bed, but</p> <p>3 I'm not sure.</p> <p>4 Q. What type of guns were those?</p> <p>5 A. Pistol. One pistol. I don't know</p> <p>6 the others, what she has.</p> <p>7 Q. So you knew she had a pistol. You</p> <p>8 knew she had at least maybe one more gun?</p> <p>9 A. Yes.</p> <p>10 Q. And you don't know whether it was a</p> <p>11 pistol, rifle or something else?</p> <p>12 A. I think it was a .22.</p> <p>13 Q. So another pistol?</p> <p>14 A. No. That was a rifle.</p> <p>15 Q. A .22 is a rifle? Okay.</p> <p>16 We just talked about what Renae has,</p> <p>17 a pistol and a .22 rifle. Did she have any</p> <p>18 other guns?</p> <p>19 A. I don't know.</p> <p>20 Q. And where would she normally keep</p> <p>21 those? In her bedroom, you said?</p> <p>22 A. They would have been upstairs</p> <p>23 somewhere. I'm not sure.</p> <p>24 Q. Do you know if they were locked in a</p>	<p>1 A. Not that I know of.</p> <p>2 Q. And Kierra?</p> <p>3 A. They were Renae's guns. I don't</p> <p>4 know if it was in her possession or not,</p> <p>5 because she does target practice. I don't</p> <p>6 know.</p> <p>7 Q. Okay. So you don't know exactly how</p> <p>8 many guns Renae has, but she would allow</p> <p>9 Tyeler and Kierra to use them; is that fair to</p> <p>10 say that?</p> <p>11 A. Practice, yes, when she was with</p> <p>12 them.</p> <p>13 Q. Okay. And that would happen on your</p> <p>14 property, right?</p> <p>15 A. Yes; only on our property.</p> <p>16 Q. And what about Monica; did she have</p> <p>17 any guns?</p> <p>18 A. No.</p> <p>19 Q. Was she living there?</p> <p>20 A. No.</p> <p>21 Q. Oh, okay. She wasn't living there.</p> <p>22 All right. My focus at this point is on who</p> <p>23 was living there in February 2018.</p> <p>24 Actually, did I narrow that down? I</p>
<p>1 safe or anything?</p> <p>2 A. I don't know.</p> <p>3 Q. Okay. So we talked about Renae's</p> <p>4 guns. We talked about your husband's handgun.</p> <p>5 What other guns were in the house besides</p> <p>6 those guns and yours and the ones in the safe?</p> <p>7 A. I don't know if there was any</p> <p>8 others. I don't know.</p> <p>9 Q. Did Jeffrey have any guns?</p> <p>10 A. No.</p> <p>11 Q. Why not?</p> <p>12 A. I don't know.</p> <p>13 Q. Okay. Did Mark have any guns?</p> <p>14 A. Not that I knew of.</p> <p>15 Q. Did Clyde have any guns?</p> <p>16 A. No.</p> <p>17 Q. Did Richard -- I guess is it Ricky</p> <p>18 for your grandson?</p> <p>19 A. Yes. No, he didn't have any in the</p> <p>20 house.</p> <p>21 Q. Okay. How about Tyeler?</p> <p>22 A. I think it would be Renae's gun.</p> <p>23 Q. He didn't have his own gun in</p> <p>24 February 2018?</p>	<p>1 think I asked you who is living there today.</p> <p>2 Is that who you were explaining?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. So let's ask that question.</p> <p>5 In February 2018, February 23rd, 2018, who was</p> <p>6 living at your house or regularly staying over</p> <p>7 there?</p> <p>8 A. Joe Kluska, Renae Kluska, Tyeler</p> <p>9 Trinkley, Kierra Kluska, Richard Anglemeyer,</p> <p>10 me, Clyde Buskirk, Jeffrey Anglemeyer, and</p> <p>11 Mark Anglemeyer.</p> <p>12 Q. Okay. And was Ricky living there</p> <p>13 too?</p> <p>14 A. Not at that time, no.</p> <p>15 Q. Okay. Sorry. I forgot to ask that</p> <p>16 earlier.</p> <p>17 And I asked you if Jeffrey had any</p> <p>18 guns. You said no. Did Mark have any guns in</p> <p>19 February 2018 at the house?</p> <p>20 A. No.</p> <p>21 Q. How about Joe Kluska?</p> <p>22 A. No.</p> <p>23 Q. We talked about Tyeler. We talked</p> <p>24 about Kierra.</p>

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1 Okay. I'm going to show you another
2 picture. Let me pull it up for you first.
3 This is a photograph taken by the local police
4 after they conducted their search, and they
5 indicate that all these guns were located in
6 your house. Would it surprise you that that
7 number of guns was located throughout either
8 your house, the garage or the trailer?

9 MR. ZEIGER: I'll object to
10 hearsay as to the picture. You'd have to
11 have the local police officer
12 authenticate the picture. I would also
13 object that your question calls for
14 speculation. So I'll instruct her to
15 answer if she can, but also tell her not
16 to guess.

17 MR. BRADFORD: Okay. Your
18 objection is noted.

19 BY MR. BRADFORD:

20 Q. Would it surprise you that that
21 number of guns, the firearms, were located in
22 your house as of February 23rd, 2018?

23 A. No.

24 Q. Okay. I'm going to show you -- this

1 his room? Like would you go in the room?

2 A. Yeah. I used to do some of his
3 laundry. He's usually like a mess with his
4 laundry.

5 Q. Did you ever see a gun in that room?

6 A. No.

7 Q. What was his job at that time?

8 A. He didn't really have a job. He
9 just helped out at the Quarry and around the
10 house.

11 Q. Other than the --

12 A. Oh, wait a minute. I think he was
13 working. Hold on. I think he was working at
14 JFR Salvage.

15 Q. I'm sorry. He was working where?

16 A. JFR Salvage.

17 Q. Was that a full-time job, to your
18 recollection?

19 A. It was. Mm-hmm. Yes.

20 Q. Other than the arrest at the bar we
21 talked about, are you aware of Mark being
22 arrested other times?

23 A. I don't know. I don't remember.

24 Q. You have no recollection?

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1 will be marked D-7.

2 I'm going to show you another
3 picture, and this is just a close-up of the
4 table that was in the previous picture. This
5 is D-8. Do you recognize any of these guns?

6 MR. ZEIGER: I have the same
7 objection. Instruct you to answer.

8 THE WITNESS: It's hard to
9 tell.

10 BY MR. BRADFORD:

11 Q. But the one picture is the one I
12 showed you earlier, at least it appears to be;
13 is that fair to say?

14 A. I don't recognize that one at all.

15 Q. Okay.

16 A. It's hard to tell. Some of them
17 look familiar. It's hard to tell.

18 Q. Okay. In February 2018, Mark was
19 living there, correct?

20 A. Yes.

21 Q. Did he have his own room in the
22 house?

23 A. Yes.

24 Q. Do you know exactly what he kept in

1 A. Pardon me?

2 Q. You don't recall?

3 A. No.

4 Q. Okay. You're not aware of an
5 incident in 2009 when he was chased by the
6 police after appearing before a district
7 justice for a hearing?

8 A. I remember that.

9 Q. What do you remember about that?

10 A. That they broke into my house after
11 him.

12 Q. Okay. And do you know what police
13 department that was?

14 A. Bushkill.

15 Q. And tell me what you recall about
16 that incident from the beginning.

17 A. To tell you the truth, that's all I
18 do remember.

19 Q. Okay.

20 A. I forget what -- I don't remember
21 what it was for.

22 Q. Do you remember what he was in court
23 for?

24 A. I don't remember.

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<p style="text-align: right;">Page 58</p> <p>1 Q. Did Renae have her own bedroom? 2 A. Yes. 3 Q. And you said she kept her guns in 4 there? 5 A. Yes, as far as I know. 6 Q. As far as you know. Right. 7 Actually, you said you knew they were just 8 upstairs somewhere. 9 Did you live downstairs? 10 A. Yes. 11 Q. Okay. And Jeffrey, he had his own 12 room at that time? 13 A. No, not at the time. 14 Q. Where was he staying, like where 15 would he spend the night? 16 A. It's like an open room just before 17 my bedroom. 18 Q. And I'll ask you the same questions. 19 What arrests are you aware of Jeffrey having? 20 A. I'm not aware of too much of it. I 21 know he was arrested, but I -- I wasn't 22 involved in it. I don't know. 23 Q. Do you remember what it involved at 24 all or just generally the charges or anything?</p>	<p style="text-align: right;">Page 60</p> <p>1 A. No. 2 Q. You never heard of that? 3 A. No. 4 Q. But you never confirmed one way or 5 another that he was growing -- you just heard 6 he was growing marijuana in the room; you 7 never saw that? 8 A. Correct. 9 Q. Did you ever go check to see if that 10 was happening or talk to him about that? 11 A. No. 12 Q. You know he was actually charged 13 with crimes related to marijuana and Molotov 14 cocktails? Did you know that on -- 15 A. Yes. 16 Q. -- February -- okay. 17 And you know he pled guilty to 18 possession of drug paraphernalia? 19 A. Yes. 20 Q. He got six months probation. Does 21 that sound right? 22 A. I really don't know. 23 Q. Okay. Did you learn that -- I guess 24 back then, Renae and Joe Kluska, they shared a</p>
<p style="text-align: right;">Page 59</p> <p>1 A. It's been a long time. I don't 2 remember it. 3 Q. Do you remember it involving 4 distributing drugs? 5 A. I don't know anything about that. 6 Q. Do you recall him facing charges for 7 resisting arrest? 8 A. No. 9 Q. Tyeler Trinkley, did he have his own 10 room in February of 2018? 11 A. Did he have what? 12 Q. His own room. 13 A. Yes. 14 Q. Do you know what he kept in that 15 room? Would you go in that room? 16 A. No. 17 Q. No? 18 Did you learn after February 23rd, 19 2018 that he was growing marijuana in that 20 room? 21 A. I was told it. 22 Q. Did you learn that he had materials 23 that could be used to create Molotov 24 cocktails?</p>	<p style="text-align: right;">Page 61</p> <p>1 room? 2 A. Yes. 3 Q. Did you know before February 23rd, 4 2018 that they had a large amount of cash 5 hidden in a secret compartment in the floor? 6 A. No. 7 Q. You're aware of that now? 8 A. Yes. 9 Q. Do you know why they had that cash? 10 A. Well, they were living here for free 11 and they were saving their money. 12 Q. All right. So I want to move on to 13 exactly what happened February 23rd, 2018. 14 Are you okay? We did not take a break -- 15 A. I'd like to get up and walk around a 16 little. 17 Q. Let's do that. I understand that. 18 A. Yes. 19 Q. That would be helpful. 20 A. And I need that, and I need to take 21 my medicine. 22 Q. Okay. 23 (Short recess.) 24 BY MR. BRADFORD:</p>

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<p>1 Q. Mrs. Anglemeyer, February 23rd, 2018 2 is the date the State Police showed up at your 3 house?</p> <p>4 A. Yes.</p> <p>5 Q. So I want to talk about that.</p> <p>6 It's my understanding they showed up 7 around 6:00 a.m.?</p> <p>8 A. Yes.</p> <p>9 Q. Just tell me what you were doing at 10 6:00 a.m. right immediately before that 11 happened, I guess?</p> <p>12 A. Sleeping.</p> <p>13 Q. So you're sleeping, and you're 14 sleeping in the lower level, right?</p> <p>15 A. Yes.</p> <p>16 Q. In the bedroom in the lower level?</p> <p>17 A. Yes.</p> <p>18 Q. How far is your bedroom from the 19 French door on the lower level?</p> <p>20 I guess that's kind of a weird 21 question. Is it like right inside that French 22 door or is it like further back?</p> <p>23 A. Oh, no. It's about 60 or 70 feet.</p> <p>24 Q. Okay. You're sleeping in your</p>	<p>1 seemed like forever, but I just couldn't move. 2 I just laid there, and eventually the 3 ambulance came and took me to the hospital.</p> <p>4 Q. Okay. That's a good summary, and 5 I'm going to ask you some questions about each 6 part of that.</p> <p>7 First of all, it was 6:00 a.m. in 8 February. Was it dark outside?</p> <p>9 A. Yes.</p> <p>10 Q. And in your house, was it, at least 11 the area that you were in, your bedroom and 12 just outside your bedroom, was it dark there?</p> <p>13 A. It was dark, except for a couple of 14 little night lights.</p> <p>15 Q. So you heard the noise. What type 16 of noise did you hear?</p> <p>17 A. It was like a big bang, like 18 somebody -- you know, like people falling or 19 something, and I just didn't know what was 20 going on. I came out to see what was going 21 on. I didn't know if somebody got hurt or 22 what was going on.</p> <p>23 Q. Okay.</p> <p>24 A. And I just got up and come out.</p>
<p>1 bedroom. Is the door open or closed; do you 2 remember?</p> <p>3 A. I don't know anything until I heard 4 a noise.</p> <p>5 Q. Okay. So take me through what you 6 recall, and then I'm going to break it down. 7 It's going to be tedious, but that's what I 8 need to do. I'm sorry.</p> <p>9 A. I was sleeping and I heard a big 10 noise, and I got up and I come to walk out of 11 my bedroom and into the other room where my 12 son usually sleeps and --</p> <p>13 Q. Which son is that?</p> <p>14 A. Jeffrey.</p> <p>15 Q. Okay.</p> <p>16 A. And I just felt something hard hit 17 me in the face, and I just flew backwards and 18 flat on my back, and I just screamed, because 19 I was in such pain. And I remember my husband 20 yelling, you could cripple her, call an ambulance, she just had surgery.</p> <p>21 And I said, they broke my teeth off. 22 And I was just laying there. I couldn't move. 23 And I don't know how long I laid there. It</p>	<p>1 Q. And I see you're wearing glasses 2 now. When you got up to see what was going 3 on, did you have your glasses on?</p> <p>4 A. No.</p> <p>5 Q. Did that affect your vision?</p> <p>6 A. I can see pretty good distance 7 without them, but I need them for computer, 8 for reading, and it helps a little for 9 distance, but not a lot.</p> <p>10 Q. Okay. So you come out of the 11 bedroom and now you're in the -- I guess it's 12 an open area where Jeffrey was staying?</p> <p>13 A. Yes.</p> <p>14 Q. So you get fully into that area or 15 did you just get into the doorway leading to 16 that area?</p> <p>17 A. I come out of the door and I come 18 out some, and as soon as I got out a little 19 ways, I got hit in the mouth really hard, and 20 it just threw me back and I hit the floor and 21 I got --</p> <p>22 Q. I'm just trying to figure out 23 exactly where you were located when that 24 happened. So were you near the doorway to</p>

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1 your bedroom?

2 A. I was in the other room a little
3 ways.

4 Q. A little ways?

5 A. Maybe halfway.

6 Q. Okay, halfway. All right.

7 Before you got struck with something
8 really hard, before you got struck and you
9 went to the ground, what else did you hear at
10 any point after you heard the big noise?

11 A. That was it. After I heard the
12 noise and come out the room, I got hit and
13 that's all -- that was it for me.

14 Q. How much time passed from when you
15 heard the noise, woke up, and got hit with
16 something hard?

17 A. Almost instantly.

18 Q. And I'm sure you weren't timing it,
19 but what did it feel like? Five seconds? Ten
20 seconds?

21 A. I couldn't say. It was almost
22 instantly. I come out of the room and I got
23 slammed to the floor, and that was all --
24 that's it.

1 Q. Okay. And I asked if you saw any
2 person before you were struck with that. You
3 didn't see not only like any police but you
4 didn't see any -- like you didn't see Jeffrey
5 or anyone else that lived with you?

6 A. No. No.

7 Q. All right. I'm going to go back.
8 You were hit. It was something hard. It hit
9 you in the face; is that what you said?

10 A. Yes.

11 Q. Did it strike you in any other part
12 of your body?

13 A. Not that I know of. It broke my
14 front teeth off.

15 Q. Okay. We'll talk about that.

16 You go to the ground. When you hit
17 the ground, I guess you went -- I'm
18 envisioning you falling kind of backwards?

19 A. Yes.

20 Q. And I guess maybe your butt and your
21 back hit the ground, or what strikes the
22 ground?

23 A. Well, I had a complete black and
24 blue hip and a big contusion on my hip the

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1 Q. Before you got slammed to the floor,
2 did you see any other person?

3 A. No.

4 Q. Did you see any lights?

5 A. No.

6 Q. Did you have any idea what was going
7 on?

8 A. No, none.

9 Q. Is it fair to say you were
10 disoriented being that you just were at the
11 time sleeping?

12 A. No. I was awake. It scared me with
13 the noise, because I didn't know what was
14 going on. My husband is elderly and I didn't
15 know if he fell or what went on. I didn't
16 know. I just got up to check and walked out
17 and I was slammed to the floor instantly.

18 Q. Okay. So you didn't hear anyone
19 giving you commands to do anything?

20 A. No.

21 Q. And you don't even know what struck
22 you?

23 A. No. It was something hard. I don't
24 know. I don't know what it was.

1 size of a baseball, and I must have hit my
2 head, because I had trouble with my ears and
3 dizziness, and of course my back, it fractured
4 the L2 in my upper back, and my elbows hit the
5 floor really hard, because I had to have
6 surgery in my arm. I kept getting shocks down
7 my hand, and my arm still ain't right. It's
8 numb.

9 Q. Okay. And we're going to talk about
10 those injuries in a bit.

11 So the ground that you hit, was it
12 carpeted or was it tile? What was the
13 flooring in that area?

14 A. It's tile concrete.

15 Q. Okay. And you just landed on the
16 floor? Did you hit like a table around or
17 anything else or you just, as far as you
18 recall --

19 A. There was a China closet there. I
20 could have hit that, because it's right at the
21 corner there. I could have hit that.

22 Q. But you're not sure if you did?

23 A. All I know is I got hit and I hit
24 the floor, and I was in such pain that I

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<p style="text-align: right;">Page 70</p> <p>1 just -- I can't really tell you anything else. 2 Q. Okay. And that's what we do here. 3 We exhaust your memory of things, and that's 4 all I can do. 5 You're on the ground. You remember 6 your husband yelling to call an ambulance? 7 A. I heard him yell to the police, sir, 8 you could cripple her for life, call an 9 ambulance, she just had surgery. 10 Q. Okay. So at some point you figured 11 out this is the police are there? 12 A. Yes. 13 Q. And that's after you're already on 14 the ground. You didn't realize it was the 15 police before that? 16 A. No. When the police -- they did say 17 to me, well, where's the drugs? 18 I said, I don't have any drugs. 19 Q. This is while you're on the ground? 20 A. Yes. This is while I'm on the 21 ground. I said, I don't have any drugs. The 22 only thing I have is my medicine. 23 Q. Okay. First of all, who was this? 24 Was this one of the --</p>	<p style="text-align: right;">Page 72</p> <p>1 actually see is this trooper who is asking you 2 about the drugs? 3 A. Right. 4 Q. Okay. And you're on the ground and 5 he's talking to you while standing? 6 A. I imagine. Like I said, I was in a 7 lot of pain, a lot of pain. 8 Q. Okay. So -- 9 A. I only had my surgery four months 10 ago, you know, and they knocked me on the 11 floor and breaks more of it. 12 Q. Okay. So the trooper asked you 13 about the drugs. You say you just have my own 14 medications. What happens next? 15 A. Well, I laid there for a while, and 16 finally I guess the ambulance got here and 17 then I guess there was two troopers came in 18 and they picked me up and sat me on the bed 19 that was in the room where Jeff used to sleep 20 on, and then they made me walk out to the 21 ambulance. 22 Q. Okay. So the two troopers sit you 23 on the bed. Is this before the medical people 24 arrive or are the medical people already</p>
<p style="text-align: right;">Page 71</p> <p>1 A. I couldn't say who it was. It was 2 just police and they were in these uniforms. 3 Can't recognize them. 4 Q. Okay. This person you were speaking 5 with, this one person, was there anything 6 distinctive about him, like a beard or -- 7 A. No. 8 Q. It's my understanding they were 9 wearing like helmets and things like that -- 10 A. Yes. 11 Q. -- on a lot of their heads? 12 A. Correct. 13 Q. Okay. So while you're on the 14 ground, one of the troopers is asking you 15 questions about the drugs, like you just 16 talked about, right? Where is your husband at 17 this point? Is he right there or where -- 18 A. Well, I couldn't see because I'm 19 laying on the floor and he's in the other room 20 and he's on the floor somewhere. 21 Q. So you heard your husband's voice, 22 but you didn't actually see him? 23 A. Right. 24 Q. Okay. And then the first person you</p>	<p style="text-align: right;">Page 73</p> <p>1 there? 2 A. They didn't let the medical people 3 come in to get me. They made me walk out to 4 them. 5 Q. Okay. So my understanding is 6 correct, at some point two troopers -- how did 7 they take you off the ground? Were you using 8 your own power at all? 9 A. No. They picked me up and sat me on 10 the bed. 11 Q. Okay. 12 A. And then they walked me out to the 13 ambulance. 14 Q. Okay. And did you have any 15 conversation whatsoever with either of those 16 two troopers? 17 A. No. 18 Q. And when you say walked you out, 19 they walked you outside of the house or just 20 to a different room? 21 A. They walked me through the house and 22 out in through the driveway to the ambulance. 23 Q. So out the French doors to the -- 24 and there was an ambulance out there?</p>

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<p>1 A. Actually, they took me out, I think, 2 through the bedroom. There's French doors 3 there and then there's a bedroom alongside 4 with another door going outside. 5 Q. Okay. I got you. 6 A. They didn't take me through the 7 French doors, because it was smashed in. 8 Q. Okay. Before you got outside, did 9 you see any other of your family members, 10 anyone else who lived in the house? 11 A. I seen Jeff -- no. I seen Mark 12 sitting on the couch in his underwear. I seen 13 my husband laying on the floor handcuffed. I 14 seen Clyde on the floor handcuffed. And 15 that's all I remember. 16 Q. And was that while you were sitting 17 on the bed or was that on your way out? 18 A. That was when they were walking me 19 out. 20 Q. Okay, when you were walking out. 21 Is Clyde a very small man? 22 A. Yeah. He weighs 110 pounds. 23 Q. Okay. And the reason I ask that is 24 because we have -- and Brian will agree to</p>	<p>1 the hospital? 2 A. Yes. 3 Q. And Saint Luke's Anderson Campus in 4 Easton? 5 A. Yes. 6 Q. Okay. After the troopers handed you 7 off to the EMTs in the driveway, did you have 8 any other contact with any law enforcement? 9 A. No. 10 Q. Okay. From the moment you got 11 struck by the hard object and fell down to the 12 point that you were receiving care from the 13 EMTs, about how long had passed? 14 A. It seemed forever, but I couldn't 15 say for sure. 16 Q. Okay. Now, I do want to talk about 17 your injuries, and I have tons of medical 18 records, some through your counsel, some 19 through subpoenas, and we're certainly not 20 going to go through all of those. I haven't 21 made my way through all of them, but I do want 22 to talk about a few things. 23 So you go to the ER at Saint Luke's. 24 I have, according to the records, that you</p>
<p>1 this -- that we had prior testimony about 2 someone that we didn't know was in the house 3 before and he describes someone like this. 4 Okay. You give him a space to stay almost in 5 like a converted closet? 6 A. He's a little slow. 7 MR. ZEIGER: If we can just go 8 off the record for a second. 9 MR. BRADFORD: Sure. 10 (Discussion held off the 11 record.) 12 BY MR. BRADFORD: 13 Q. Were you ever handcuffed or zip tied 14 or were your hands ever bound at any point? 15 A. No. I was just laying on the floor, 16 couldn't move. 17 Q. Okay. So you're taken out to the 18 ambulance and then you started receiving 19 medical care from the EMTs? 20 A. Yeah. They took me in, they laid me 21 down, and I said, I can't lay on my hip. I 22 said, I think it's broken. But it was just a 23 big contusion. 24 Q. Okay. And then did they take you to</p>	<p>1 arrived at 6:58 a.m. and you departed at 9:35 2 a.m., you were discharged. Does that sound 3 about right? 4 A. I don't know what times. 5 Q. Okay. 6 A. I know they called me the next day 7 and told me that my back was fractured, the 8 L2, and that I went back with the ambulance 9 again, but they don't deal with backs at 10 Anderson, so they sent me to Fountain Hill 11 Saint Luke's the next day. And I was there in 12 a lot of pain and there they put me in a back 13 brace. 14 Q. Okay. So is it fair to say that, to 15 the best of your recollection, you were at the 16 emergency department on February 23rd for a 17 couple hours? 18 A. Mm-hmm. Yes. 19 Q. And did they take an x-ray there, or 20 what did they do for you there? 21 A. I think they did an MRI. I don't 22 know. 23 Q. Did you get any information about 24 the status of your back at that point?</p>

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<p style="text-align: right;">Page 78</p> <p>1 A. Not at that point. They sent me 2 home and then called me later and said that my 3 back was fractured, and that's when I went 4 back to Fountain Hill in Saint Luke's. 5 Q. Okay. Got you. 6 And when you went to Fountain Hill, 7 about how many days after was that? 8 A. That was the next day. 9 Q. Okay. And you mentioned that you 10 had surgery on your back a few months before 11 this? 12 A. Yes. 13 Q. And was that for the installation of 14 orthopedic hardware at the L4 and L5? 15 A. Yes. 16 Q. Okay. Did you learn that that was 17 still stable after February 23rd, 2018? 18 A. Pardon me? Can you repeat that? 19 Q. Yes. Did you have any damage to 20 that part of your back after February 23rd, 21 2018? 22 A. To which part of my back? 23 Q. The L4-L5 -- 24 A. That's where I had the surgery.</p>	<p style="text-align: right;">Page 80</p> <p>1 This is actually -- this is going to be D-9, 2 which is a series of medical-related 3 documents, and I'll identify by Bates stamp 4 the numbers as we go along here. 5 The first one I want to show you is, 6 if I can read the Bates number, PSP-2550. 7 It's the first page of this document. The 8 only reason I show you this, Mrs. Anglemeyer, 9 is this is an exam at the Northeastern 10 Rehabilitation Associates back in January 11 26th, 2016, and this verifies what we've been 12 talking about, that you -- at this part in the 13 middle of that bigger paragraph about history 14 of present illness, it says, "She had ongoing 15 disabling lower back pain, which persists." 16 So as of 2016, you were having 17 disabling lower back pain; is that fair to 18 say? 19 A. Yes. 20 Q. Okay. And at that time you were 21 receiving Oxycodone? 22 A. Yes. 23 Q. Five milligrams? 24 A. Right.</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. Right. Did they look at that and 2 determine that that was still stable? 3 A. Yes. They said that was still 4 intact. 5 Q. Intact? Thank you. 6 A. That was their words. 7 Q. That's the word I should have been 8 using. 9 It's my understanding that you had a 10 compression fracture of your L2 that you 11 didn't have before? 12 A. Right. 13 Q. Okay. And I have the surgery as 14 taking place on October 18th, 2017. Does that 15 sound about right? 16 A. Yes. That is it. 17 Q. That's it? Okay. 18 Before that, did you have back 19 problems well before that? 20 A. Yes. 21 Q. How long have you had back problems? 22 A. Quite a few years. 23 Q. I'm going to share a screen with you 24 here. I'm going to identify the document.</p>	<p style="text-align: right;">Page 81</p> <p>1 Q. Okay. And then I'm going to share a 2 screen again. I'm moving to the next page of 3 this D-9. This would have been -- it's a 4 medical record from November 25th, 2017, Saint 5 Luke's Hospital Anderson Campus emergency 6 department. This would have been after your 7 surgery but before the events of February 8 23rd, 2018. You went to the emergency 9 department. Do you remember doing that? 10 A. For what? 11 Q. Here, I'll scroll down to -- the 12 first page is 2011. This should be 2012, 13 PSP-2012. Let me see if I can highlight this 14 or do something with it. It says that you 15 were there because of your back pain. 16 "Patient reports L4, L5 surgery at Coordinated 17 Health in October. PT," patient presumably, 18 "reports increased pain since." 19 A. I don't remember, because I went 20 through a lot of appointments. 21 Q. Okay. It was an emergency 22 department appointment. Would you show up at 23 the emergency department a lot at this time? 24 A. I don't think so.</p>

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<p>Page 82</p> <p>1 Q. Okay. And this is from the same 2 day. I moved on to Page 2014. I'm going to 3 highlight, I guess, some sort of summary. 4 "Patient is a 76-year-old female presenting to 5 emergency department, back pain. Chronic. 6 Was seen for this three days ago, discharged 7 pain medications."</p> <p>8 Did I read that correctly?</p> <p>9 A. I see it.</p> <p>10 Q. So do you remember going to -- it 11 doesn't say if it's an emergency department, 12 but do you remember if -- maybe it was. Did 13 you go to the emergency department twice in 14 the span of three days?</p> <p>15 A. No. I don't think it was an 16 emergency, but I know I was getting x-rays and 17 MRIs quite often, because I just had surgery 18 and they were checking it out as it was 19 healing.</p> <p>20 Q. I understand.</p> <p>21 I'm just scrolling through more 22 records from this same visit on November 25th, 23 2017. Now I'm on page PSP-20 -- I think 24 that's 29, and the only reason -- I'm</p>	<p>1 correct?</p> <p>2 A. Correct.</p> <p>3 Q. I'm just going to read from this. 4 It says History in the middle of the page. 5 I'm going to read from the part that's 6 highlighted or I guess boxed in red. "Chief 7 Complaint: Patient presents with back pain. 8 Patient was knocked down when home was raided 9 by police. History of back SX," which means 10 something.</p> <p>11 "76-year-old female presents to the 12 emergency department via EMS from her home. 13 EMS relates that there had been a raid of her 14 home and that she had been pushed to the 15 ground. Patient relates that she went flat 16 onto her back. She has ongoing back pain 17 which intensified immediately following the 18 fall. History of surgery on October 18, 2017 19 with hardware placement. She reports having 20 had damage to the leg and resultant drop foot 21 afterwards. She additionally notes that two 22 of her teeth are broken. She suggests that 23 she may have been hit with a shield. She 24 expresses concern over her husband who was</p>
<p>Page 83</p> <p>1 directing your attention to the middle of the 2 page, which notes Departure Condition and 3 "mobility at departure: Walker."</p> <p>4 Do you remember, were you using a 5 walker at that point?</p> <p>6 A. Yeah. They didn't want me to fall.</p> <p>7 Q. Okay. And were you using a walker 8 all the time at that point or maybe just 9 walking leaving that appointment?</p> <p>10 A. I was just using the walker a little 11 bit at that time, because they really 12 didn't -- he said I should just not make sure 13 I fall.</p> <p>14 Q. Okay. As of February 23rd, 2018, 15 were you still using a walker?</p> <p>16 A. No.</p> <p>17 Q. Okay. Now we've moved on to the 18 visit from February 23rd, 2018. I'm going to 19 just direct your attention to page Anglemeyer 20 007 -- 17. Excuse me. I'll represent to you 21 that this is from February 23rd, 2018 visit to 22 the Saint Luke's Anderson Campus that you had 23 presumably right after you were taken there 24 after departing the house with the ambulance,</p>	<p>Page 85</p> <p>1 knocked to the ground and her dogs. She did 2 take Oxycodone five milligram at 6:00 a.m. as 3 well as her Gabapentin and calcium. She 4 denies any ongoing medical condition. Review 5 of chart lists hypertension, GERD, CAD and 6 CKD."</p> <p>7 Did I read that correctly?</p> <p>8 A. Does it say I don't have -- let's 9 see. "She denies any ongoing medical 10 conditions." Yeah, with GERD. Yeah, I had 11 that. I have that, yeah. I don't -- there's 12 not really that much wrong with me besides my 13 back and my -- well, now I have a lot wrong 14 with me, but then I didn't.</p> <p>15 Q. Okay. And "patient relates that she 16 went flat onto her back," which is --</p> <p>17 A. Right.</p> <p>18 Q. -- what you told me earlier when you 19 were describing it?</p> <p>20 A. Right. It should have said 21 something in there about how I said I 22 complained about my elbow with the shocks 23 going up and down my arm, but it don't say 24 that.</p>

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<p style="text-align: right;">Page 86</p> <p>1 Q. Yeah. I was going to ask you about 2 that, because I haven't seen any medical 3 records having to do with the elbow. 4 A. I had surgery on it. 5 Q. Okay. 6 A. Dr. Weiss. 7 Q. Okay. When did you have that 8 surgery? 9 A. You know what, I was trying to think 10 myself and I can't remember. I'd almost have 11 to call the doctor. 12 Q. Well, like is it closer in time to 13 today or is it closer in time to February 14 23rd, 2018? 15 A. It was afterwards, because I had -- 16 I thought it would go away. I was hoping it 17 would go away, because I was getting these 18 shocks down my hand, but it wouldn't go away, 19 and every time I went to use it, I got more 20 shocks. So that's when I went and seen the 21 doctor. And then it took time for all the 22 tests and stuff before I had the surgery. 23 Q. And you never had this type of issue 24 before February 23rd, 2018?</p>	<p style="text-align: right;">Page 88</p> <p>1 hit me. 2 Q. Okay. February 23rd, 2018 before 3 the police came, did you have any sort of back 4 brace or anything like that? 5 A. I had wore it before that, because I 6 was getting older. In fact, I had just went 7 on vacation in January on a cruise and I was 8 getting better, and that really -- it set me 9 back big time. 10 Q. Yeah. When you were on the cruise 11 in January, did you have the back brace with 12 you? 13 A. No. 14 Q. It says here that you had taken the 15 Oxycodone at 6:00 a.m. Would that have 16 affected your -- I'm a little -- 17 A. It doesn't affect me. 18 Q. Okay. I'm actually a little 19 confused by that, because if the police got 20 there at 6:00 a.m., how did you have time to 21 take the Oxycodone or did you take it 22 afterwards or what? 23 A. I don't know why it says that, 24 because I didn't take nothing. I got up out</p>
<p style="text-align: right;">Page 87</p> <p>1 A. No, and I have -- my hand is still 2 numb. I don't get the shocks, I don't have 3 the pain, but my fingers, my three fingers, 4 are still numb, and it goes all the way up to 5 my elbow. 6 Q. And would this numbness, did that 7 develop -- had it developed by the point you 8 got to the emergency department that same day 9 or did it develop later? 10 A. It developed later, the numbness, 11 but I did tell them at the hospital. They 12 went to put IV in my arm, and I said, don't 13 use that arm because I'm getting shocks down 14 my hand. I don't know -- and so I know I 15 reported it, and they knew it. 16 Q. I want to read this to you. This 17 part says, "She suggests she may have been hit 18 with a shield." 19 Now, of course they're just writing 20 down what they think they heard from you. Do 21 you remember if you told them that you -- 22 A. I didn't know what happened. I 23 thought maybe it could be a shield. I don't 24 know. All I know is it was really hard and it</p>	<p style="text-align: right;">Page 89</p> <p>1 of bed and I came out. I didn't take no 2 medicine. 3 Q. Okay. So -- 4 A. They might have gave it to me at the 5 hospital, but I didn't take it that morning. 6 I didn't have time. 7 Q. Okay. So you're saying that you had 8 no advanced notice that the police were 9 coming? 10 A. Pardon me? 11 Q. You had no advanced notice that the 12 police were coming that morning? 13 A. No. I didn't know. 14 Q. Okay. I want to talk about the L2 15 compression fracture, I'm going to move to 16 next. I'm still sharing my screen here. I'm 17 moving through Anglemeyer-111, the 24th page 18 of this document. 19 This shows that you went to 20 Coordinated Health on March 6th, 2018 to see 21 Dr. Wagener? 22 A. Yes. 23 Q. And is that someone you had been 24 seeing before February 23rd, 2018?</p>

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<p>1 A. Wagener?</p> <p>2 Q. Yes.</p> <p>3 A. Yes. He was my surgeon.</p> <p>4 Q. He was the surgeon?</p> <p>5 A. Yeah; in October.</p> <p>6 Q. Okay. Got you. So you were 7 regularly seeing him anyway before February 8 23rd --</p> <p>9 A. Yes.</p> <p>10 Q. -- to follow up on your surgery?</p> <p>11 A. Right.</p> <p>12 Q. And I'm going to the third page of 13 this note, which is 113, and the part where it 14 says Discussion/Summary. "Patient is 15 following up from traumatic home injury. 16 Dr. Wagener discussed that her L2 fracture 17 will heal on its own."</p> <p>18 A. Yeah. I had to wear the brace 19 again.</p> <p>20 Q. Okay. When did you start wearing 21 the brace again?</p> <p>22 A. At the Saint Luke's Fountain Hill.</p> <p>23 Q. Okay. Where you --</p> <p>24 A. The next day.</p>	<p>1 visit with Dr. Wagener. This one is on 2 October 12th, 2018. Do you see that at the 3 top?</p> <p>4 A. Mm-hmm.</p> <p>5 Q. Is this picking up for you? I don't 6 want this to be an eye test. I can zoom in a 7 little bit. Is that helpful?</p> <p>8 A. Yeah. That's okay.</p> <p>9 Q. Okay. And I'm going to scroll to 10 the third page -- actually, this is the second 11 page, which is Anglemeyer-96. You see here in 12 the middle, I have it in the red box. It 13 says, "She states that her low back still 14 hurts, but feels like she is improving."</p> <p>15 A. Okay. That's Dr. Naftalin. That's 16 my pain specialist.</p> <p>17 Q. Okay. It seems to indicate that you 18 were seeing Dr. Wagener here.</p> <p>19 A. But when you went down there, it 20 said Dr. Naftalin. That's the pain 21 specialist.</p> <p>22 Q. Okay. It says recorded. Okay.</p> <p>23 Well, either way, you told someone 24 at Coordinated Health that your low back still</p>
<p style="text-align: center;">Page 91</p> <p>1 Q. On February 24th, okay. And they 2 tell you to wear the brace?</p> <p>3 A. Right.</p> <p>4 Q. At this point, are you still wearing 5 the brace?</p> <p>6 A. No.</p> <p>7 Q. How long did you wear the brace for 8 about?</p> <p>9 A. You mean for the L2?</p> <p>10 Q. Yes, for the L2.</p> <p>11 A. Two months.</p> <p>12 Q. Okay. It actually says something 13 about it right here, but I don't know what 14 that --</p> <p>15 A. Yes.</p> <p>16 Q. I don't know what that translates 17 to, status --</p> <p>18 A. Well, they said I didn't have to 19 sleep in it.</p> <p>20 Q. Okay. Ten hours a day, it looks 21 like, which is about a month after, less than 22 a month, a few weeks afterwards. Okay.</p> <p>23 I'm going to continue to another --</p> <p>24 the next page is Anglemeyer-95. It's another</p>	<p style="text-align: center;">Page 93</p> <p>1 hurts, but feels like it is improving?</p> <p>2 A. Yeah. It was -- well, it still is. 3 I'm still on medication.</p> <p>4 Q. And is that for the L4-L5 or just 5 for the L2; do you know?</p> <p>6 A. I don't know. I don't think I could 7 tell you the difference, because I hurt both 8 places.</p> <p>9 Q. I'm going to scroll to the third 10 page from this visit. We're at Anglemeyer-97. 11 And I'm just going to read from this one part. 12 "Education was given that the patient's 13 location of fusion appears healed. Her L2 14 fracture is healing, if not healed. At this 15 time surgery is not needed or offered."</p> <p>16 A. Correct.</p> <p>17 Q. Okay. So did you ever have any 18 surgery on the L2?</p> <p>19 A. No. I had injections.</p> <p>20 Q. Injections? Okay.</p> <p>21 A. Yes.</p> <p>22 Q. For the L2. How many times?</p> <p>23 A. A couple of times. I'm not exactly 24 sure. I know it was a couple of times. In</p>

24 (Pages 90 to 93)

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<p style="text-align: right;">Page 94</p> <p>1 fact, I just had injections a couple months 2 ago.</p> <p>3 Q. Do you still see Dr. Wagener? 4 A. No.</p> <p>5 Q. Who do you see now? 6 A. I'm trying to think of his name. 7 Luchetti -- Luchette, Cedar Crest, Allentown. 8 Q. Why do you no longer see 9 Dr. Wagener? 10 A. After the surgery, he didn't seem to 11 want to be bothered.</p> <p>12 Q. Do you remember when you stopped 13 seeing him? I'm sure it's in your records 14 somewhere, but off the top of your head, at 15 least generally?</p> <p>16 A. No. I don't know. I'd have to look 17 at the records.</p> <p>18 Q. Were you doing physical therapy for 19 your back?</p> <p>20 A. Yes.</p> <p>21 Q. Was that happening before February 22 23rd, 2018?</p> <p>23 A. I'm not sure. All I know is they 24 said that it wasn't -- they discharged me</p>	<p style="text-align: right;">Page 96</p> <p>1 Q. All right. And before then your two 2 front teeth were in good condition? 3 A. Yeah. Yes.</p> <p>4 Q. What did you do about the teeth? 5 A. Went to the dentist, Amara Dental. 6 They put caps on.</p> <p>7 Q. And since you put the caps on, have 8 you had any problems since then? 9 A. Yes. My gums got infected and I had 10 to go through a Dr. Miller, because Amara 11 Dental wasn't open because of the virus. So I 12 had to go -- in fact, I had to wait quite a 13 while with an infection in my gums.</p> <p>14 Q. And I don't have your records yet 15 from the dental. 16 A. That would be Miller. 17 Q. Dr. Miller, who is not associated 18 with Amara Dental? 19 A. Yes. They are associated with him. 20 Q. What's that? I'm sorry. 21 A. They are associated with Amara 22 Dental. 23 Q. Okay. And this infection, was it 24 recent?</p>
<p style="text-align: right;">Page 95</p> <p>1 because it wasn't helping. 2 Q. Do you remember if it was around 3 this time that you stopped -- 4 A. I don't remember. 5 Q. -- the physical therapy? 6 Okay. Was it at least in some point 7 in 2018? 8 A. I can't say. 9 Q. Okay. No problem. 10 Let me stop sharing the screen for a 11 second. 12 As we already talked about, you said 13 your teeth got chipped or knocked out as a 14 result of this interaction? 15 A. Broke off. 16 Q. Broke off, okay. 17 I'm going to share my screen again. 18 I'm going to zoom out a little bit here. I'm 19 showing you the last page of D-9. It's 20 Anglemeyer-0001. Does this reflect the damage 21 to your teeth from February 23rd, 2018? 22 A. Yes. 23 Q. When was this picture taken? 24 A. When I came home from the hospital.</p>	<p style="text-align: right;">Page 97</p> <p>1 A. Well, it lasted quite a while 2 because I couldn't get to a dentist because of 3 the virus. 4 Q. So it had to be from this year then, 5 right? 6 A. Yeah. And he also said that I might 7 have to have root canals, because they still 8 are tender and hurt. 9 Q. He told you the infection was from 10 the caps on your two front teeth? 11 A. Well, actually, he almost did like 12 surgery. He loosened my gums and went up and 13 filed some of the bone off, and that was a 14 rigamarole. 15 Q. But did he say it was from the -- 16 and we'll get the records, but did he tell you 17 that it was from the caps or was it from 18 the -- 19 A. He didn't mention it to me. I did 20 mention it to him what had happened, but 21 then he didn't really say anything. He just 22 said they were really infected. 23 Q. Your gums were infected? 24 A. Yes. And he had to cut them away</p>

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<p>1 and file the bone down and stitch my gums back 2 and...</p> <p>3 Q. Was that limited just to right above 4 your two front teeth or was it other parts of 5 your mouth as well?</p> <p>6 A. Just my two front teeth.</p> <p>7 Q. Did he say anything that you did or 8 didn't do that contributed to that?</p> <p>9 A. No.</p> <p>10 Q. Did you have any issues with your 11 front teeth before -- I mean, I guess they 12 were in good condition, but did you have any 13 issues with them before February 23rd, 2018, 14 just so you get the question?</p> <p>15 A. I think I had the one fixed. That's 16 a long time ago. I don't remember.</p> <p>17 Q. I'm going to show you a document. I 18 do have one -- maybe a couple pages of dental 19 records that I received through your attorney. 20 Let me share this. This is Anglemeyer-84.</p> <p>21 MR. BRADFORD: I'll add this to 22 D-9, Brian, this page.</p> <p>23 MR. ZEIGER: No objection.</p> <p>24 MR. BRADFORD: Okay.</p>	<p>1 A. Yes. 2 Q. -- right? 3 I'm really happy that medical 4 records have gotten more towards typing and 5 electronic, because I really can't read this. 6 I think we all are.</p> <p>7 Okay. So would that sound right 8 then, about three days after the incident you 9 went to see your dentist?</p> <p>10 A. Yes.</p> <p>11 Q. Do you remember who your dentist 12 was? Was that Amara Dental at that time or 13 was that someone else?</p> <p>14 A. I'm not sure. I used to go to 15 Dr. Ferster, but he retired, so I'm not sure 16 if that was Dr. Ferster or if it was Amara 17 Dental, but Amara Dental are the ones that did 18 the x-rays and put the crowns on.</p> <p>19 Q. Okay. And how do you spell Ferster, 20 F-E-R-S-T-E-R?</p> <p>21 A. I guess that's how.</p> <p>22 Q. That's what it sounds like. 23 And where was he located, at least 24 like what town?</p>
<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> <p style="text-align: center;">Page 99</p> <p>THE WITNESS: I can't read that.</p> <p>BY MR. BRADFORD:</p> <p>Q. Okay. Yeah. So I'll tell you these appear to be records -- it's just a page of a record which appears to relate to your teeth. I don't have it signed by anybody, but I want to talk about this. I will note at the top it has your name at the top, provided by your counsel to me.</p> <p>Now, let's start here at -- I'll make this as big as we can. I'm towards the bottom here, 2/26/18. It says 8 and 9. I'm going to try to read this. You tell me if it sounds like I'm reading it right. "Fractured teeth, patient describes hit in mouth by police," and then there's some just initials, which might mean something medically.</p> <p>A. Yeah. It's very hard to read.</p> <p>Q. Yes. I agree with you, but "potential future endo, definitely will require crowns. Transitional restorations at this time."</p> <p>Does that seem about --</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> <p style="text-align: center;">Page 101</p> <p>A. Wind Gap. I think he retired. He was going to retire and then this virus came and I think he fully just retired.</p> <p>Q. Okay. And so I want to bump up a little bit to an earlier entry on this page and -- well, before we leave the 2/26, it says -- let's go to the top so we know what column that is. It says tooth number, and then you scroll down to the 2/26/18 visit and it says "8, 9," which would presumably be your two front teeth, right?</p> <p>A. Right.</p> <p>Q. And bumping up to March 27, 2017, the tooth number is 8, and it says "fracture total" something, and then the second line says something with numbers. I don't know what that means. And then the third line says "rebond fractured tooth structure."</p> <p>A. I said I chipped one of my front teeth and they fixed it.</p> <p>Q. Okay. And I'm just trying to explore that a little bit.</p> <p>So do you remember, how did you chip your tooth?</p>

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<p style="text-align: right;">Page 102</p> <p>1 A. I think I bit on a piece of hard 2 candy. I think. 3 Q. And did the front tooth -- we're 4 only talking about one of your front teeth. 5 It's the 8, I guess, which I don't know if 6 that's left or right. 7 A. It just chipped the corner off. 8 Q. Okay. And then I guess going down 9 to 12/14, it says "rebond fractured tooth 10 structure." 11 A. Well, I think that's what I was 12 telling you. They just bonded it. That's all 13 that was wrong with it. 14 Q. Yeah. So you went to the dentist 15 twice for that at least? 16 A. Well, sometimes you can't get things 17 done the first time. They look at it and then 18 they make you come again. 19 Q. Okay. Now, before February 2017 had 20 you had any issues with your front teeth? 21 A. No. 22 Q. A few more pages of this record. So 23 eventually you got crowns for these two teeth? 24 A. Yes. Like I said, I still might</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. I'm sorry if I asked you this. 2 A. You'd have to look at the records, 3 because I can't tell you the dates. 4 Q. All right. And did the surgery 5 improve things at all? 6 A. It took the shock pains away, but I 7 still am numb. 8 Q. Have you seen anyone for your mental 9 health since February 23rd, 2018? 10 A. No. 11 Q. Do you understand that on February 12 23rd, 2018 Mark Anglemeyer was charged with 13 certain drug crimes? 14 A. Yeah. I guess he was charged, but 15 nothing came of it. 16 Q. Do you understand why they were -- 17 do you understand what happened? You said 18 nothing came of it. Do you understand exactly 19 what happened with those charges? 20 MR. ZEIGER: Objection. 21 THE WITNESS: I don't think 22 they found any drugs. 23 MR. ZEIGER: Object and say 24 calls for a legal conclusion.</p>
<p style="text-align: right;">Page 103</p> <p>1 have to have root canals, because they said 2 when you get -- this is what the dentist told 3 me. If you get hit in your mouth, it jars 4 your teeth and it damages the root, the nerve. 5 Q. Okay. You already talked about the 6 gum issue you had earlier this year. Other 7 than that, have you had any other issues with 8 the crowns? 9 A. Just that they are very sensitive 10 and they hurt sometimes. Like I said, I might 11 need root canals, but I'm putting that off. 12 Q. All right. I think we've kind of 13 explored this, the elbow pain. Who are you 14 seeing for the elbow pain? 15 A. Dr. Weiss. 16 Q. And what was the surgical procedure 17 that you had? 18 A. I had surgery. I don't know what 19 you want to call it, on the nerve. It's on 20 the bottom of my elbow. I don't know if you 21 can see it. From the bottom of my elbow here 22 and I was cut all the way up (indicating). 23 Q. Okay. And when was this about? 24 A. Dates.</p>	<p style="text-align: right;">Page 105</p> <p>1 MR. BRADFORD: Well, I'm asking 2 her understanding, but your objection is 3 noted. 4 BY MR. BRADFORD: 5 Q. So it's your understanding that the 6 reason they were dropped was because they 7 didn't find any drugs? 8 A. I don't know. I think that's it, 9 but I only think. 10 Q. Did you attend any hearings -- 11 A. No. 12 Q. -- related to that? 13 So is it fair to say your 14 information about these charges would have 15 come from Mark? 16 A. Yeah, I guess. I don't know. 17 Q. Did you talk to the DA or anyone 18 about this? 19 A. No. 20 Q. Did you understand that Joe Kluska 21 was charged with crimes on February 23rd, 22 2018? 23 A. Yes. 24 Q. Do you know it was related to his</p>

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<p style="text-align: right;">Page 106</p> <p>1 possession of marijuana? Did you know that? 2 A. Yes. 3 Q. Did you know that there was 4 marijuana in his room? 5 A. No. 6 Q. And do you know if he pled guilty to 7 that charge? 8 A. As far as I know. 9 Q. And, again, your information would 10 have come through -- 11 A. Just talking to him. 12 Q. -- Joe Kluska himself or Renae? 13 A. Correct. 14 Q. Was your bar in the process of being 15 shut down by the DA or the county or the local 16 authorities as a nuisance bar? 17 A. Yes. 18 Q. Is that part of the reason you sold 19 it or sold the liquor license? 20 A. I got tired of it. I told you I was 21 just tired of the episode that was going on 22 and I just didn't want it. But I never lost 23 my liquor license. 24 Q. So you were able to sell the liquor</p>	<p style="text-align: right;">Page 108</p> <p>1 BY MR. BRADFORD: 2 Q. Have the police been to your house 3 since February 23rd, 2018, any law 4 enforcement? 5 THE WITNESS: Were the police 6 here? 7 MR. ANGLEMEYER: What? 8 THE WITNESS: Since February 9 the 23rd. Did they stop in here for some 10 reason? I think -- oh, yeah. They 11 stopped here a couple times and it was 12 about -- it was a Karen episode. 13 MR. ANGLEMEYER: Oh, yeah. 14 BY MR. BRADFORD: 15 Q. In regards to what did they stop by? 16 A. There was a friend that was living 17 with my son and she kept texting me all the 18 time with crazy stuff, and I reported it to 19 the police, and they got in touch with her and 20 they actually arrested her for the things that 21 she was doing, and she never showed up or 22 anything like that and we had a hearing, and I 23 guess finally they did catch up with her, 24 because I know the DA called me and wanted to</p>
<p style="text-align: right;">Page 107</p> <p>1 license? 2 A. Yes. 3 Q. Give me one second. I think I'm 4 almost done here. If you want to take five 5 minutes. 6 A. No. That's okay. I'd rather just 7 get it over with. 8 Q. Brian might have questions. 9 MR. BRADFORD: Brian, are you 10 going to ask questions? Should we give 11 her a break now? 12 MR. ZEIGER: I'm not going to 13 answer that question. 14 MR. BRADFORD: I won't put you 15 on the spot. 16 MR. ZEIGER: I appreciate the 17 general courtesy, but I never really 18 understand why anyone asks their own 19 witness questions unless there's like a 20 major error going on. It seems to be 21 against all the trial advocacy rules that 22 I teach. 23 (Discussion held off the 24 record.)</p>	<p style="text-align: right;">Page 109</p> <p>1 see if I wanted to continue with anything that 2 she was arrested for, and she didn't show up, 3 so she was found guilty, and I said as long as 4 she left me alone, I didn't want to do 5 anything. So, yeah, I was in contact with the 6 police a couple times. 7 Q. Got it. 8 And which son was this? Someone was 9 staying with one of your sons? 10 A. Yeah. It was with Vernon 11 Anglemeyer. 12 Q. So was she staying at your house or 13 was she staying with -- 14 A. She was staying with him. 15 Q. Staying with him, but she was 16 sending you -- 17 A. All kinds of nasty texts. 18 Q. Okay. And so you called the police 19 to report this, and they came to your house to 20 basically interview you and get the 21 information? 22 A. Yes. And then a couple of times 23 they stopped back to let me know they couldn't 24 find her and they filed different things.</p>

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<p style="text-align: right;">Page 110</p> <p>1 Finally we had a hearing without her and so -- 2 but that's over now and she's leaving us 3 alone, so...</p> <p>4 Q. Okay. So were you satisfied with 5 that police interaction?</p> <p>6 A. Yeah. We got along fine.</p> <p>7 Q. Okay. What police department was 8 that?</p> <p>9 A. Bushkill.</p> <p>10 Q. Oh, that's what I wanted to ask you.</p> <p>11 A. Actually, the cop said he liked us.</p> <p>12 Q. All right. I showed you a 13 photograph of a number of guns. What efforts 14 have you made to get those guns back?</p> <p>15 A. We drove down to the police 16 department and gave them a letter requesting 17 that they would be given back, and I think our 18 attorney requested it also.</p> <p>19 Q. Do you have an attorney working on 20 getting these guns back?</p> <p>21 A. Not yet.</p> <p>22 Q. Okay.</p> <p>23 A. Yeah, I guess we do. Molnar in Wind 24 Gap.</p>	<p style="text-align: right;">Page 112</p> <p>1 about getting the guns back for everyone. 2 Mom has not been involved, but you can 3 ask her any questions you like.</p> <p>4 MR. BRADFORD: Right. I 5 appreciate that explanation. That will 6 speed things up.</p> <p>7 MR. ZEIGER: Right.</p> <p>8 BY MR. BRADFORD:</p> <p>9 Q. Well, based on that, you understand 10 that the State Police -- when you left the 11 property in the ambulance, were the State 12 Police still there?</p> <p>13 A. Yes.</p> <p>14 Q. So you don't know when they left, 15 you don't know what they did afterwards?</p> <p>16 A. No.</p> <p>17 Q. At least firsthand. You would only 18 know based on what other people told you?</p> <p>19 A. Right.</p> <p>20 Q. Okay. And you understand, as your 21 attorney just said, that the State Police, who 22 I represent, did not remove any of those 23 weapons and do not possess those weapons?</p> <p>24 A. Can you repeat that?</p>
<p style="text-align: right;">Page 111</p> <p>1 Q. Who was that?</p> <p>2 A. We talked to Molnar in Wind Gap. My 3 son has a lawyer.</p> <p>4 MR. ZEIGER: Kevin, I can put 5 on the record that they asked me to ask 6 you. I did, and you know that. And then 7 I told them that it wasn't you. It was 8 Northampton County that was the issue and 9 the problem, which is true. And then 10 Jeff, who you'll get to depose tomorrow, 11 contacted a local lawyer out that way to 12 see if they would file a motion for 13 return of property, which I instructed 14 him to do.</p> <p>15 And so I would just kindly -- 16 you don't have to, of course, listen to 17 me, but I would just kindly ask you to 18 direct this question to Jeff when you do 19 his deposition.</p> <p>20 MR. BRADFORD: That's fine. 21 That's fine.</p> <p>22 MR. ZEIGER: And Renae, who is 23 not on the schedule here for this round, 24 Renae is the one I've been talking to</p>	<p style="text-align: right;">Page 113</p> <p>1 Q. You understand that the State Police 2 did not remove any of those weapons from your 3 property and do not possess any of those 4 weapons that were on your property?</p> <p>5 MR. ZEIGER: Can we go off the 6 record for a second.</p> <p>7 MR. BRADFORD: Yes. (Discussion held off the 8 record.)</p> <p>9 MR. BRADFORD: I am done my 10 questioning. So thank you, 11 Mrs. Anglemeyer. I appreciate your time. 12 I know this wasn't fun and I know it was 13 uncomfortable for you too because of your 14 medical issues. So thank you, though.</p> <p>15 THE WITNESS: Okay.</p> <p>16 MR. ZEIGER: All right. (Exhibits D-1 through D-9 17 marked for identification.) (Witness excused.)</p> <p>18 (Deposition concluded at 11:56 19 a.m.) - - -</p>

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1 CERTIFICATE

2 I HEREBY CERTIFY that the
3 proceedings, evidence and objections are
4 contained fully and accurately in the
5 stenographic notes taken by me upon the
6 foregoing matter, and that this is a true and
7 correct transcript of same.

8
9
10
11
12
13 -----
14 MICHELE L. MURPHY
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16
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62:10 64:7	100:17	15:24 28:14	109:2	79:18,21	64:11,12	Bradford 2:8	Buskirk 9:17
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